

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Hallmark Finishing LLC
Attn: Ron Bergstrom
13000 East State Route 17
Grant Park, Illinois 60940

<u>Application No.:</u> 05030056	<u>I.D. No.:</u> 091816AAE
<u>Applicant's Designation:</u>	<u>Date Received:</u> March 14, 2005
<u>Subject:</u> Wood Furniture Manufacturing Plant	
<u>Date Issued:</u> July 28, 2006	<u>Expiration Date:</u> July 28, 2011
<u>Location:</u> 13000 East State Route 17, Grant Park	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of six wood furniture coating booths pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 100 tons per year, individual hazardous air pollutants (HAPs) to less than 10 tons per year and a combination of such HAPS to less than 25 tons per year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) issued for this location.
2. This permit is issued based upon the wood furniture manufacturing equipment at facility not being subject to 40 CFR 63, Subpart JJ National Emission Standard for Wood Furniture Manufacturing Operations. This is consequence of the federally enforceable limitations of this permit restricting potential and actual HAP emissions to below major source threshold levels defined in 40 CFR 63.2.
3. The coating lines shall comply with the VOM emission limitations of 35 Ill. Adm. Code Part 215, Subpart F: Coating Operations. Compliance with the requirements of this subpart is achieved through the use of compliance coating pursuant to 35 Ill. Adm. Code 215.204(1)(1) through (7). The VOM content of the coatings, as applied, excluding water and any compounds which are specifically exempted from the definition of VOM, and transfer efficiencies shall comply with the following values:

<u>Coating</u>	<u>VOM Content (Lbs/Gallon)</u>
Clear Topcoat	5.6
Opaque Stain	4.7
Pigmented Coat	5.0
Repair Coat	5.6
Sealer	5.6
Semi-Transparent Stain	6.6
Wash Coat	6.1

The repair coat shall have transfer efficiency no less than 30 percent; all other coating shall have an overall transfer efficiency of 65%.

- 4a. The VOM emissions from the six coating booths (combined) shall not exceed 5.0 tons/month and 43.6 tons/year. Compliance with annual limits shall be determined from a running total of 12 months of data.
- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- c. The VOM/HAP emissions shall be determined from the following equation:

$$E = \sum (M_i \times V_i) - \sum (W_j \times V_j),$$

where:

E - VOM/HAP emissions (tons);

M_i - VOM/HAP-containing material usage (tons);

V_i - VOM/HAP content of material (fraction);

W_j - certified amount of waste shipped-off (tons);

V_j - certified VOM/HAP content of the waste (fraction).

These limits are based on the maximum production rate. Compliance with annual limits shall be determined from a running total of 12 months of data.

- d. These limits define the potential emissions of the VOM and HAPs and are based on the actual emissions determined from the maximum production capacity. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. This permit is issued based on negligible emission of the particulate matter from the coating booths. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- 6a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- b. The Permittee shall maintain daily records of the following items:
 - i. The name, identification number and category (per listing in 35 Ill. Adm. Code 215.204(1)) of each coating as applied each day;
 - ii. The weight of VOM per volume of each coating (minus water and exempt compounds which are specifically exempted from the definition of VOM) as applied;
- c. The Permittee shall maintain monthly records of the following items:
 - i. Name and amount of each VOM/HAP-containing material used (tons/month, tons/year);
 - ii. VOM/HAP content of each material (weight %);
 - iii. Certified amount of waste solvent shipped-off (tons/month, tons/year);
 - iv. Certified VOM/HAP content of waste (weight %); and

- v. VOM and individual and total HAP emissions with supporting calculations (tons/month, tons/year);
- 7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:VJB:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the wood furniture coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons per year of volatile organic material, 10 tons per year of individual hazardous air pollutants, and 25 tons per year of a combination of hazardous air pollutants at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less volatile organic material and hazardous air pollutants are used and control measures are more effective than required in this permit.

Emission Units	VOM	PM	Single HAP	Total HAP
Six coating booths	43.6	0.44	< 10	< 25

VJB:psj